# EXHIBIT C

## Bauer, S. Derek

From:

Matt Parrish < Matt.Parrish@robbinsfirm.com>

Sent:

Monday, October 28, 2019 9:54 AM

To:

Bradberry, Kevin

Cc:

Bauer, S. Derek; Byrnside, Ian; Jason Alloy

Subject:

RE: GDE/ECG - Settlement

Good for signatures. Naj is supposed to be stopping by today to sign.

#### Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com>

Sent: Friday, October 25, 2019 7:16 PM

To: Matt Parrish < Matt. Parrish@robbinsfirm.com>

Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy

<Jason.Alloy@robbinsfirm.com>
Subject: Re: GDE/ECG - Settlement

Hi Matt, just checking in on this. Are we good for signatures?

On Oct 23, 2019, at 10:01 PM, Bradberry, Kevin < kbradberry@bakerlaw.com > wrote:

Sent from my mobile device

Matt,

Good evening. I've attached what I believe to be final copies of the agreement and the letter (with Brian's contact information filled in). If these meet your approval, please have Ms. Kermani sign. Once we have the signed letter (an emailed copy will suffice while the original is in the mail), we will have Brian execute the settlement.

Thanks,

Kevin

From: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Sent: Friday, October 18, 2019 2:16 PM

To: Bradberry, Kevin < kbradberry@bakerlaw.com >

Cc: Bauer, S. Derek < dbauer@bakerlaw.com >; Byrnside, Ian < ibyrnside@bakerlaw.com >; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

# Case 2:16-cv-00276-RWS Document 91-3 Filed 12/06/19 Page 3 of 12

Yes, we can agree on the one week extension for discovery responses. Let's talk early next week. Thanks.

#### Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com >

Sent: Friday, October 18, 2019 2:10 PM

To: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Byrnside, Ian <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Matt,

Glad to hear it! I will check with him on the address, but it may be over the weekend or Monday before I can confirm. Can we agree to one final one-week extension of discovery deadlines and we will get these inked early next week?

Thanks,

Kevin

From: Matt Parrish < Matt. Parrish@robbinsfirm.com>

Sent: Friday, October 18, 2019 11:00 AM

To: Bradberry, Kevin < kbradberry@bakerlaw.com >

Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Ok we are agreed on the language of the letter. What address should we use for Brian?

#### Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com >

Sent: Thursday, October 17, 2019 2:42 PM

To: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Matt,

We are fine with your rewording in #1 below. For #2, Plaintiffs originally insisted that the letter be separate from the settlement agreement, which we accepted. Including the language you propose would be a course reversal — and we do not agree with the wording in any event — so rather than argue about it, we deleted it. The attached letter reflects those changes, as well as two other nits in redline.

For the settlement agreement, it appears that your "redline" did not have any changes to the edits proposed in our 10/13 version. I have attached a "clean" (i.e., renamed) version of the same. If the changes to the letter are acceptable, then we have a deal. Please confirm at your earliest opportunity.

Thanks,

Kevin

From: Matt Parrish < Matt.Parrish@robbinsfirm.com >

**Sent:** Wednesday, October 16, 2019 4:31 PM **To:** Bradberry, Kevin < <u>kbradberry@bakerlaw.com</u>>

Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>>
Subject: RE: GDE/ECG - Settlement

Two small edits to the letter:

- 1. We don't have to argue about it.
- 2. We'd like the letter to reference to the Settlement Agreement, so I added that sentence.

If we're agreed on these points, we can agree to your changes to the Settlement Agreement (including Garland), and we'll be done.

#### Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com > Sent: Wednesday, October 16, 2019 10:33 AM
To: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Cc: Bauer, S. Derek <a href="mailto:com">dbauer@bakerlaw.com</a>; Byrnside, Ian <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Matt,

Checking in -- I didn't heard anything back from you. What is your status on this?

Thanks,

Kevin

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From: Matt Parrish < Matt.Parrish@robbinsfirm.com > Sent: Monday, October 14, 2019 8:49 AM To: Bradberry, Kevin < kbradberry@bakerlaw.com> Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy <Jason.Alloy@robbinsfirm.com> Subject: RE: GDE/ECG - Settlement I wasn't able to connect with Naj over the weekend about this, although I know she's extremely . I have to go take a deposition most of the day today. I'll be back to you resistant to this evening or tomorrow morning. Matthew T. Parrish www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569 From: Bradberry, Kevin < kbradberry@bakerlaw.com> **Sent:** Sunday, October 13, 2019 1:45 PM To: Matt Parrish < Matt.Parrish@robbinsfirm.com > Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy <Jason.Alloy@robbinsfirm.com> Subject: RE: GDE/ECG - Settlement Thank you, Matt. Per our discussion on Friday, to resolve the last points of contention, we will agree to your proposal that My understanding is that you are confirming this with your client. As promised, we had a few edits to the letter you sent, which are attached as redlines. In addition, I have attached a copy of the settlement agreement in the form we propose (there are no additional changes to the version I sent 10/10, but I just redated this one so it's clear that it reflects the offer above.) If all of this is good for your side, then I think we have a deal. Thanks, Kevin From: Matt Parrish < Matt.Parrish@robbinsfirm.com>

Sent: Friday, October 11, 2019 5:49 PM

To: Bradberry, Kevin < <a href="mailto:kbradberry@bakerlaw.com">kbradberry@bakerlaw.com</a>>

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Byrnside, Ian < <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

# Case 2:16-cv-00276-RWS Document 91-3 Filed 12/06/19 Page 6 of 12

Per our discussion earlier, the due dates for our respective pending discovery responses shall be extended by mutual agreement to **Monday, October 21** while we attempt to work out the last details of this settlement.

#### Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com >

Sent: Friday, October 11, 2019 3:57 PM

To: Matt Parrish < <a href="Matt.Parrish@robbinsfirm.com">Matt.Parrish@robbinsfirm.com</a>>

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Byrnside, Ian < <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Matt,

Just wanted to follow up on my voicemail from a little while ago – will you please give me a call on this?

Thanks,

Kevin

From: Matt Parrish < Matt.Parrish@robbinsfirm.com>

Sent: Friday, October 11, 2019 2:13 PM

To: Bradberry, Kevin < kbradberry@bakerlaw.com >

Cc: Bauer, S. Derek <a href="mailto:dbauer@bakerlaw.com">dbakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

I understand that our clients talked last night and Naj reiterated that

So if we can agree on we'll provide a letter in the form of the attached, which we believe is consistent with their discussions.

#### Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Matt Parrish

Sent: Thursday, October 10, 2019 4:55 PM

To: Bradberry, Kevin < kbradberry@bakerlaw.com >

Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy

<Jason.Alloy@robbinsfirm.com>
Subject: RE: GDE/ECG - Settlement

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On point 1, my response is the same as yours – that wasn't the agreement. Naj is going to call Brian about it, then we'll put something on paper.

Good on the last two points if we can reach agreement on the first two.

#### Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com >

Sent: Thursday, October 10, 2019 3:28 PM

To: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Cc: Bauer, S. Derek < dbauer@bakerlaw.com >; Byrnside, Ian < ibyrnside@bakerlaw.com >; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Matt,

Responses are in red below. Attached is a redline to your clean version that reflects the comments below. Please let me know where this leaves us.

Thanks,

Kevin

From: Matt Parrish < Matt.Parrish@robbinsfirm.com >

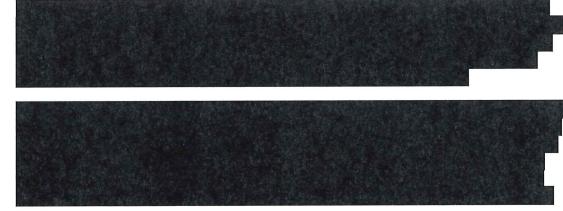
Sent: Thursday, October 10, 2019 1:06 PM

To: Bradberry, Kevin < kbradberry@bakerlaw.com >

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Byrnside, Ian < <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

See our revisions attached in clean and redline. The key remaining sticking points are:





# Matthew T. Parrish www.robbinsfirm.com

Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com >

Sent: Thursday, October 10, 2019 11:34 AM

To: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbakerlaw.com</a>; Byrnside, Ian < <a href="mailto:dbyrnside@bakerlaw.com">dbyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Hi Matt,

Tagging up on this – when do you expect you'll have edits over to us?

Thanks,

Kevin

### Case 2:16-cv-00276-RWS Document 91-3 Filed 12/06/19 Page 9 of 12

From: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Sent: Wednesday, October 9, 2019 6:38 PM

To: Bradberry, Kevin < kbradberry@bakerlaw.com >

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Jason Alloy

<Jason.Alloy@robbinsfirm.com>
Subject: RE: GDE/ECG - Settlement

Naj was tied up today, will get back to you tomorrow morning with edits.

#### Matthew T. Parrish

www.robbinsfirm.com

Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com >

Sent: Wednesday, October 9, 2019 10:11 AM

To: Matt Parrish <a href="Matt.Parrish@robbinsfirm.com">Matt.Parrish@robbinsfirm.com</a>

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Byrnside, Ian < <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Your modification was

Happy to discuss if further clarification is needed.

Kevin

From: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Sent: Wednesday, October 9, 2019 10:05 AM

To: Bradberry, Kevin < kbradberry@bakerlaw.com>

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Byrnside, lan < <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

No, I included a , , and you took it out. Why?

Matthew T. Parrish

www.robbinsfirm.com

Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com >

Sent: Wednesday, October 9, 2019 10:03 AM

To: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Byrnside, Ian < <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

Again, happy to discuss. In one of your previous emails, you objected to

Kevin

From: Matt Parrish < Matt.Parrish@robbinsfirm.com >

**Sent:** Wednesday, October 9, 2019 9:54 AM **To:** Bradberry, Kevin < <u>kbradberry@bakerlaw.com</u>>

Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** RE: GDE/ECG - Settlement

? Seriously? For what, exactly?

Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Matt Parrish

**Sent:** Wednesday, October 9, 2019 9:38 AM **To:** Bradberry, Kevin < <u>kbradberry@bakerlaw.com</u>>

Cc: Bauer, S. Derek < dbauer@bakerlaw.com>; Byrnside, lan < ibyrnside@bakerlaw.com>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> Subject: RE: GDE/ECG - Settlement

Naj saw your proposed agreement, she just didn't like the terms. Hence, our revisions. I've sent her this agreement, we'll get back to you with any comments, hopefully today.

Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com >

Sent: Wednesday, October 9, 2019 9:02 AM
To: Matt Parrish < Matt.Parrish@robbinsfirm.com>

Cc: Bauer, S. Derek <dbauer@bakerlaw.com>; Byrnside, Ian <ibyrnside@bakerlaw.com>; Jason Alloy

<Jason.Alloy@robbinsfirm.com>
Subject: RE: GDE/ECG - Settlement

Matt:

I left you a voicemail yesterday afternoon, but wanted to follow up given the time constraints here. The draft agreement you sent over does not reflect the parties' agreement, and from what we understand, Naj has not even seen a copy of the original proposed agreement. We will agree to

With regard to			

Accordingly, we rejected many of the deletions in your draft and added in some additional language

Please transmit this copy to your client.

Happy to discuss as needed.

Thanks,

Kevin

From: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Sent: Tuesday, October 8, 2019 3:21 PM

To: Bradberry, Kevin < <a href="mailto:kbradberry@bakerlaw.com">kbradberry@bakerlaw.com</a>>

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbakerlaw.com</a>; Byrnside, lan < <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>>
Subject: RE: GDE/ECG - Settlement

Attached see a redline of the revised settlement agreement with

. You are welcome to call me to discuss.

Also, I believe we have responses to your Second RFP due tomorrow. If you could grant us a week extension, as we did with the discovery to your clients, while we try to finalize this settlement we'd appreciate it.

#### Matthew T. Parrish

www.robbinsfirm.com Office: (404) 856-3272 Cell: (404) 520-0569

From: Bradberry, Kevin < kbradberry@bakerlaw.com>

Sent: Tuesday, October 8, 2019 1:52 PM

To: Matt Parrish < Matt.Parrish@robbinsfirm.com >

Cc: Bauer, S. Derek < <a href="mailto:dbauer@bakerlaw.com">dbauer@bakerlaw.com</a>; Byrnside, Ian < <a href="mailto:ibyrnside@bakerlaw.com">ibyrnside@bakerlaw.com</a>; Jason Alloy

<<u>Jason.Alloy@robbinsfirm.com</u>> **Subject:** GDE/ECG - Settlement

Matt:

Good afternoon. Following up on my voicemail from a moment ago, it's my understanding that our clients have reached a deal and the settlement agreement is now in your hands for some edits to the releases. When do you anticipate having a revised draft back to us?

Thanks,

**Kevin Bradberry** 

Associate

<image001.jpg>

# 

1170 Peachtree Street | Suite 2400 Atlanta, GA 30309-7676 T +1.404.256.8783

kbradberry@bakerlaw.com bakerlaw.com <image002.jpg><image003.jpg><image004.jpg>

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<Settlement Agreement and Mutual Release 10.17.19 - (clean - final).pdf>

<Naj Letter to Brian Lillie (final 10.22.19).pdf>